

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 24, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to Your Honor's Individual Practices in Civil Cases (Rev. June 28, 2021), III.D., the Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs respectfully request oral argument concerning Saudi Arabia's motion to dismiss (ECF No. 9368, filed Oct. 6, 2023).<sup>1</sup> Briefing on Saudi Arabia's motion was completed Friday, April 19, 2024. For the reasons set forth in Plaintiffs' [corrected] Opposition and Surreply filings (ECF Nos. 9539-9543 and 9706-9708, and 9711), Plaintiffs maintain that Saudi Arabia's motion should be denied. Nonetheless, Plaintiffs respectfully request oral argument to assist the Court in addressing the extensive averments and evidentiary record offered in opposition to Saudi Arabia's motion and to afford the Court the opportunity to raise any questions the Court may have of the parties.

Plaintiffs contacted counsel for the Kingdom of Saudi Arabia for the Kingdom's position on this request. Saudi Arabia's counsel responded that "Saudi Arabia agrees that oral argument on its renewed motion to dismiss is appropriate."

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

By: /s/ Robert T. Haeefe

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<sup>1</sup> Plaintiff's request for oral argument is distinct from the Plaintiffs' explanation regarding the necessity for an evidentiary hearing if the Court decides to go beyond the adequacy of Plaintiffs' *prima facie* showing to address disputed issues of fact. ECF No. 9706 n.4.

The Honorable Sarah Netburn  
April 24, 2024  
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*Attorneys for Ashton Plaintiffs*

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF